

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

CAPE ANN MARINA CORP.,

Plaintiff

vs.

WATSON INSURANCE AGENCY, INC.,

Defendant

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CIVIL ACTION

NO. 07-11983-LTS

MOTION FOR SUMMARY JUDGMENT OF THE DEFENDANT,
WATSON INSURANCE AGENCY, INC.

The Defendant, Watson Insurance Agency, Inc. ("Watson"), hereby respectfully moves that this Court grant this Motion for Summary Judgment, pursuant to Fed. Rules of Civ. Pro. 56(b) and (c). As reasons therefore, Watson states that there are no disputed issues of material fact and that it is entitled summary judgment as a matter of law. In support of this Motion, Watson relies on the following exhibits:

Exhibit A – Plaintiff's Complaint and Jury Trial Demand;

Exhibit B – Deposition Transcript of Andrew Dominick;

Exhibit C – Deposition Transcript of Tobin Arsenault;

Exhibit D - Deposition Transcript of Anne Linquata;

Exhibit E - Deposition Transcript of Lisa Nolan;

Exhibit F – Documents Produced by ACE Insurance Company.

In addition, Watson relies on its Memorandum of Law, which has been filed herewith.

The Defendant,
Watson Insurance Agency, Inc.,
By its Attorneys,

/s/ William P. Rose

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CERTIFICATE OF SERVICE

I hereby certify that on October 30, 2009, I filed a copy of the foregoing by electronic means with the United States District Court for the District of Connecticut using the CM/ECF system, which will send notification to counsel of record.

/s/ William P. Rose

William P. Rose